

NCWF Petition
North Carolina Marine Fisheries Commission Office
P.O. Box 769
Morehead City, NC 28557

ncwfpetition@ncdenr.gov

NCMFC:

As a concerned citizen, I am requesting the North Carolina Marine Fisheries Committee (MFC) to deny the Petition for Rulemaking submitted by the North Carolina Wildlife Federation that proposes to designate the internal coastal and near oceanic waters of North Carolina special secondary nursery areas. The rules proposed in the Petition would close the internal coastal waters and near-shore oceanic waters of North Carolina to trawling unless opened by the North Carolina Division of Marine Fisheries (DMF), establish a shrimp size for shrimp trawling season to open, establish a more restrictive headrope size for shrimp trawls, create a trawl tow time for shrimp trawling, further restrict the taking of shrimp to daylight hours and three days per week, require the use of two DMF certified bycatch reduction devices in shrimp trawls, and create a recreational size limit of 8 inches for spot and 10 inches for croaker.

The Petition should be denied by the MFC because of several substantial and pertinent reasons. First, the Petition should be denied because such comprehensive changes to fisheries should be developed by fishery managements plans (FMP's). The North Carolina General Assembly, through the Fisheries Reform Act, clearly desired that such comprehensive changes in management measures for important recreational and commercial species in North Carolina be developed through FMP's.

Secondly, the Petition should be denied because these issues were recently discussed and addressed by the 2015 Shrimp FMP after two years of development. Bycatch and habitat protection measures were deliberated by the DMF and MFC Shrimp FMP Advisory Committee through the development of the FMP. Recommendations were reviewed by several other MFC advisory committees. Many public meetings were held where stakeholders provided input.

Thirdly, the Petition should be denied because the cost factors described in the Petition are clearly inadequately described. This omission is significant because the shrimp fishery is North Carolina's most important fishery economically.

The proposals will have a substantial economic impact on many small businesses, have significant negative effects on coastal communities and negatively impact the availability of North Carolina shrimp to consumers, which is why we are recommending that the MFC deny the Petition for Rulemaking submitted by the North Carolina Wildlife Federation.

Sincerely,